

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,	*	
		*
Plaintiff,		*
		*
v.		*
		*
QUINTRELL MARTIN,	*	CR. NO. 2:06CR155-MHT
		*
Defendant .		*

UNOPPOSED MOTION TO CONTINUE BY DEFENDANT

Comes now Defendant Quintrell Martin, with counsel, and files this Motion to Continue, concurrently filing his Waiver of Speedy Trial, and as grounds therefor says as follows:

1. Defendant is currently pursuing additional discovery and/or materials that may have to be obtained by subpoena which Defendant believes are necessary to his defense and which may lead to motions by Defendant.

2. It is believed by the parties that this continuance may lead to resolution of this cause without trial.

3. Verne H. Speirs, A.U.S.A., has been consulted regarding this Motion and has no opposition.

WHEREFORE, the defendant moves the Court to continue the trial of this cause from the October 30, 2006, trial term to a trial term at least 60 days subsequent.

Respectfully submitted on this the 2nd day of October, 2006.

Quintrell Martin, Defendant

S/BRUCE MADDOX (MAD013)
Attorney for Quintrell Martin

Of Counsel:

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CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2006, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF System which will send notification of the filing to all parties.

s/BRUCE MADDOX